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Sable Offshore Corp.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

CENTER FOR BIOLOGICAL
DIVERSITY, et al.,

Plaintiffs,

v.

DEBRA HAALAND, et al.,

Defendants,

and

SABLE OFFSHORE CORP.,

Intervenor-Defendant.

CASE NO. 2:24-cv-05459-FMO-MAA

**DECLARATION OF DANIEL P.
BRUNTON IN SUPPORT OF SABLE
OFFSHORE CORP.'S OPPOSITION
TO PLAINTIFFS' MOTION FOR
LEAVE TO FILE FIRST
SUPPLEMENTAL AND
AMENDED COMPLAINT**

Hearing

Date: February 7, 2025

Time: 1:30 p.m.

Judge: Hon. Michelle Williams Court
Courtroom: 6A

DECLARATION OF DANIEL P. BRUNTON

Pursuant to 28 U.S.C. § 1746(2), I, Daniel P. Brunton, hereby declare:

1. I am an attorney licensed to practice law in the State of California, a member of this court, and am Counsel at Latham & Watkins LLP, counsel of record for Intervenor-Defendant Sable Offshore Corp. (“Sable”) in the above captioned action. I have personal knowledge of the matters recited herein, and if called upon to testify concerning them under oath, I could and would testify thereto.

2. A true and correct copy of the “Categorical Exclusion Review for Sable Offshore Well HE-23 – Reperforations” and “Sable Offshore Well HE-28 – Reperforations” are attached hereto as **Exhibit A** and **Exhibit B**, respectively.

3. A true and correct copy of the applications for permit to modify (“APMs”) for Well HE-23 and HE-28 are attached hereto as **Exhibit C** and **Exhibit D**, respectively.

4. The Bureau of Safety and Environmental Enforcement’s (“BSEE”) approvals of Sable’s APMs have been publicly available on the internet since at least October 12, 2024, when I reviewed them on the following website: <https://www.bsee.gov/stats-facts/ocs-regions/pacific/pacific-region-completed-applications-for-permit-to-modify-apm>.

Dated: January 17, 2025

/s/ Daniel P. Brunton

Daniel P. Brunton